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January 13, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Office of the Secretary
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Washington, DC 20554

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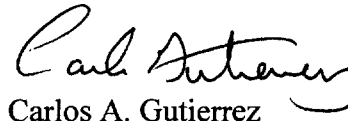
**Re: Comments of AT&T Corp. on the Report and Recommendations of the
Abbreviated Dialing Ad Hoc Working Group to the North American
Numbering Council Report Regarding Abbreviated Dialing Arrangements,
CC Docket No. 92-105**

Dear Ms. Salas:

Enclosed please find an original and four (4) copies of the comments of AT&T Corp. filed today with the Commission in the above-referenced proceeding. In addition, two copies have been filed with Jeannie Grimes of the Common Carrier Bureau and an additional copy has been filed with ITS. Also enclosed is a copy of AT&T Corp.'s comments on a 3.5 inch diskette in WordPerfect 5.1 format.

If you have any questions, please contact the undersigned.

Respectfully submitted,


Carlos A. Gutierrez

Enclosure

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In the Matter of)	
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Report and Recommendations of the)	
Abbreviated Dialing Ad Hoc Working Group)	CC Docket No. 92-105
to the North American Numbering Council)	
Regarding Abbreviated Dialing Arrangements)	
)	

COMMENTS OF AT&T CORP.

AT&T Corp. ("AT&T") hereby submits its comments in response to the Common Carrier Bureau's Public Notice on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council Regarding Abbreviated Dialing Arrangements.^{1/}

INTRODUCTION AND SUMMARY

In its report, the Abbreviated Dialing Ad Hoc Working Group ("Working Group") examines feasibility of various nationwide, multi-network and inter-network abbreviated dialing arrangements ("ADAs"), including the identification of potential formats for ADAs, the development of possible assignment guidelines, and an estimate of how rapidly ADAs could be deployed.^{2/} The Working Group concurs with the Commission's original assessment, however,

^{1/} Public Notice, Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Abbreviated Dialing Arrangements, CC Docket No. 92-105 (rel. Dec. 14, 1998).

^{2/} Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements at 3, § 1.0 (Sept. 23, 1998) ("NANC Report").

that there is “little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements at this time.”^{3/} To the extent the Commission nevertheless decides to implement ADAs, the Working Group emphasizes that “any arrangement adopted should, to the extent possible, not conflict with any intranetwork use of abbreviated dialing arrangements already in place.”^{4/} The NANC Report also sets forth several alternative formats that may be used to implement ADAs and raises other implementation considerations.

AT&T supports the conclusions set forth in the NANC Report. The Working Group, which consists of representatives from all the major segments of the industry, including local exchange carriers, interexchange carriers, wireless service providers, and equipment vendors, has presented a well-researched and balanced approach to resolving the difficult issues raised by potential implementation of ADAs. Like the Working Group, AT&T believes that there is no demonstrated market demand for nationwide ADAs other than the ones already in place. Almost no parties have proposed a use for such ADAs and it would be a mistake for the Commission to try to predict, with so little guidance, what consumers might want two years from now. Moreover, there are currently numerous alternative resources that obviate the need for Commission establishment of ADAs.

In addition, the possible applications for additional ADAs are entirely speculative at this point, making it impossible to assess thoroughly the technical and economic feasibility of a national framework. It is likely that proposals, such as that of LowTech Designs, Inc. (“LowTech”) for an inter-network ADA framework based on Advanced Intelligent Network

^{3/} Id. at 18, § 12.0.

^{4/} Id.

(“AIN”) capability, would require significant and costly network upgrades. Before the Commission pursues this type of application, it should thoroughly weigh its potential benefits and costs.

Creation of a national ADA system may also conflict with long-established local and regional ADAs. The Commission should avoid preemption of existing ADAs, which often are used to provide vital information and assistance services to end users and have evolved in response to actual market demands. Finally, even if the Commission were to establish a nationally administered ADA system, it should not adopt the leading “*” format proposed by Low Tech and currently used for Vertical Service Codes. To minimize end-user confusion, the leading “*” should continue to be used to identify only feature or service activation or deactivation and should not be linked to specific service providers.

I. ADDITIONAL NATIONALLY ADMINISTERED ABBREVIATED DIALING ARRANGEMENTS ARE UNNECESSARY

Before the Commission begins the lengthy and complicated process of establishing a nationwide ADA system, it should carefully examine whether a need for such action exists and whether the benefits outweigh the costs. While MCI correctly points out that the Commission’s N11 Codes Order found that “abbreviated dialing could clearly serve many useful purposes,”^{5/} MCI neglects to mention that in the same order the Commission also concluded that there was no public interest support for a national reservation at this time of any alternative dialing

^{5/} Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements, MCI WorldCom Minority Opinion at 29 (Sept. 23, 1998) (“MCI Minority Report”).

arrangements for any particular purpose.^{6/} Neither MCI's nor Low Tech's Minority Reports have satisfactorily explained what additional public interest considerations have arisen in the past year that would warrant reexamination of that decision.

The Commission has indicated that it will encourage the development of guidelines for the implementation of ADAs when the industry is able to identify ADAs that "would be practical, both economically and technically."^{7/} Based on the information presented in the NANC Report and the minority opinions contained therein, however, the FCC cannot conclude that the implementation of ADAs is either technically or economically feasible at this time.

The minority opinions of Low Tech and MCI Worldcom do not adequately explain how nationally administered ADAs would be used or what the costs of implementation and administration would be. Low Tech, for example, recommends that additional ADAs "only be made available for assignment to telecommunications carriers and enhanced service providers for the purpose of providing telecommunications and advanced hybrid telecom/info services" -- which, despite the limiting language, appears to apply to almost any entity that might want an ADA.^{8/} The MCI Minority Opinion is similarly vague regarding how the nationally assigned abbreviated dialing format it proposes would be administered and what costs to carriers and consumers would be involved. This limited information does not permit the Commission or the

^{6/} In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket 92-105 at ¶ 61 (rel. Feb. 19, 1997) ("N11 Codes Order").

^{7/} Id.

^{8/} Minority Report of Low Tech Designs, Inc. to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements at 26, § 5.5 (Sept. 23, 1998) ("Low Tech Minority Report").

NANC to determine whether either Low Tech's or MCI's requests – or any nationally administered ADA system for that matter – are technically or economically practical.

The NANC report itself makes clear that the introduction of new national ADAs adds a level of complication and cost that does not exist today. Vendors involved in the formulation of the NANC Report state that in order to incorporate inter-network signaling into the concept of ADAs, it would be necessary to develop new standards for non-numerical routing, receiving-end translation, interpretation, action on incoming non-numerical characters, and interoperability testing. Call treatment and call processing would have to be modified as well. The technical feasibility, implementation timeframes and operational support system impacts of ADAs would also vary depending on the specific application. Nor is the potential disruption from nationally administered ADAs limited to technical modifications that must be made across all networks. As described below, unless the Commission is careful not to preempt existing local intra-network uses of abbreviated dialing arrangements, serious customer confusion is likely to result.

Neither Low Tech nor MCI have demonstrated that the benefits of implementing national ADAs warrant the development of the necessary standards, the work required to modify networks, and the imposition of the related costs. There are already various existing numbering resources that can be used to meet the needs of those parties seeking nationally administered ADAs. As described in the NANC Report, these resources include “8YY”, “900” NPA, “976” NXX, “976 like”, and “555” numbers. These resources can currently be used both on a nationwide and regional basis to facilitate access to specialized services, without requiring modifications to existing dialing protocols or any need for additional guidelines and regulations. The Commission has specified that while ADAs such as N11 codes might be convenient for

some users, they are by no means “essential to making the service available.”^{9/} In light of the many alternatives to ADAs and the serious disruption to existing network operations and consumer interests that a nationally administered regime is likely to cause, AT&T fails to see the logic in providing a mere “convenience” for users.

The absence of nationally administered ADAs does not mean that carriers cannot offer ADAs within their own networks. The Commission has explicitly held that there is no federal policy that “bars the use of [abbreviated dialing] arrangements for intrastate service offerings.”^{10/} Carriers could easily establish intra-network ADAs through modifications to their own switching equipment on a region-by-region basis depending on customer demand. Indeed, ADAs are presently available on a local intra-network basis in many areas and are especially widespread in wireless networks. In addition, information service providers and other users can enter into contractual arrangements with multiple carriers to achieve, in effect, inter-network ADAs without the expense or time-lag of FCC-mandated national requirements. The availability of intra-network ADAs and the flexibility provided by these arrangements adequately provide the numbering resources that the minority reports suggest should be supplied by a nationally administered ADA regime.

Finally, AT&T agrees with the concerns expressed in the minority reports that incumbent local exchange carriers (“ILECs”) should be precluded from blocking access to current

^{9/} N11 Codes Order at ¶ 20. The Commission also concluded that assigning information services a common central office prefix, such as a 976 prefix, would “offer the same results as N11 without the competitive concern of having to decide to whom the codes should be assigned.” Id.

^{10/} Id. at ¶ 62.

numbering resources in a non-competitive manner. Both MCI and Low Tech argue that because of a lack of implementation orders from the Commission, ILECs have failed to offer access arrangements that would support the use of 555 NXXs for information services.^{11/} The establishment of additional ADAs, however, does not resolve MCI's and Low Tech's problem. The Commission should focus its efforts on the underlying problem of removing ILEC barriers to competition, not on creating more ADAs with equally difficult access problems.

II. NATIONALLY ADMINISTERED ABBREVIATED DIALING ARRANGEMENTS MUST TAKE INTO ACCOUNT EXSTING LOCAL APPLICATIONS

Not only is a nationally administered ADA system unnecessary and likely very costly, it has the potential to disrupt numerous existing arrangements established by carriers and relied upon by end users. Accordingly, AT&T urges the Commission to forgo creation of a national ADA regime or, in the alternative, to ensure that it takes into consideration abbreviated dialing patterns currently in use.

In this regard, AT&T concurs with the Working Group that the use of a leading "*" for ADAs is inappropriate. This format is associated with Vertical Service Codes ("VSCs"), which are used to activate and deactivate vertical services (e.g., call forwarding and caller ID blocking). Because VSCs are administered nationally and are available in most areas of the country, it would cause needless confusion to customers to apply the same format to ADAs. Changing the VSC format by increasing the number of digits required for service activation or by linking VSCs to specific service providers, as proposed by LowTech, would defeat the VSCs' purpose as general service activators and would be extremely disruptive to carriers. Extensive switch

^{11/} See Low Tech Minority Report at 25, § 5.3; see also MCI Minority Report at 30.

modifications would be necessary to permit the passage and acceptance of a six-digit format for all inter-network applications, and basing ADAs on AIN capability would preclude participation by carriers that are not currently capable of implementing AIN platforms.

In considering ADAs, the Commission should also be mindful of existing local and regional abbreviated dialing applications. As the NANC Report points out, numerous providers currently use ADAs for provision of many services on an intra-network basis. For example, many wireless carriers use a leading “#” followed by two to seven digits to provide information and safety services. The consequences of preempting such uses would, at best, be customer confusion and, at worst, could endanger the health and safety of consumers who rely on intra-network ADAs. The Commission should not establish a national system for ADAs unless and until it has developed a method to ensure that current localized information and assistance services to end users will not be disrupted.

CONCLUSION

For the reasons set forth above, AT&T respectfully requests that the Commission adopt the conclusions of the NANC Report and decline to establish a nationally administered abbreviated dialing regime at this time.

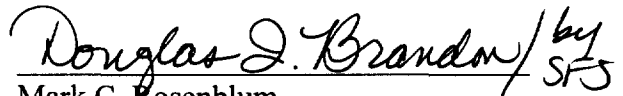
Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Carlos A. Gutierrez, hereby certify that on this 13th day of January, 1998, I caused copies of the foregoing "Comments of AT&T Corp." to be sent to the following by hand delivery:

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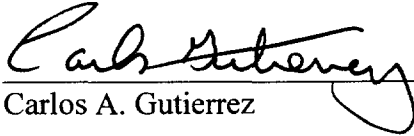
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